

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR MARCH 20, 2025
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the March 20, 2025, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Meta v. State AGs

1. Update on State Agency Agreements and Productions Following District Court’s March 6 & 10 Orders

In orders issued on March 6 and 10, 2025, the District Court denied the States’ motion for relief from this Court’s September 6, 2024 agency discovery order (ECF 1117) as to 22 States, but granted relief as to 8 States: Delaware, Kansas, Louisiana, Missouri, Nebraska, Rhode Island, South Carolina, and Wisconsin. *See* ECF 1741 and 1754. Of these 8 States:

- **Missouri** has agreed in principle to dismiss its case subject to the Parties’ memorializing their agreement in writing, as previously reported to the Court. *See, e.g.*, ECF 1430-15, 1482 at 26.
- **Kansas**: An update will be provided at the DMC.
- **South Carolina**: Agrees to complete the State’s production of state agency documents for the discovery already served under the following conditions. First, that Meta submits to South Carolina in writing that by the South Carolina Attorney General’s Office proceeding forward in the production of state agency documents, it was not a waiver of any argument made by South Carolina as it relates to custody, possession, or control of state agency documents. The South Carolina Attorney General’s Office states that it is not acting as counsel for these agencies. Second, that all the state agencies consented to the South Carolina Attorney General’s Office proceeding with the production of their documents. Finally, an agreement from Meta that South Carolina has already satisfied substantial completion deadlines in its production of documents, but that additional state agency documents would be produced no later than March 28, 2025, and privilege logs produced no later than April 18, 2025. Meta is currently in negotiations with South Carolina with respect to these

conditions and expects to reach resolution without requiring the Court's intervention.

- **Nebraska** has told Meta that, within the limited scope of its representation of specified state agencies for purposes of document discovery and production and without waiving its objections, it will abide by its existing state agency document discovery agreements with Meta, and will complete its production of state agency documents by the deadlines set forth in the stipulated schedule that this Court so-ordered (ECF 1696).
- **Wisconsin** has told Meta that, without waiving its objections, it will abide by its existing state agency document discovery agreement with Meta, and will complete its production of state agency documents by the deadlines set forth in the stipulated schedule that this Court so-ordered (ECF 1696).
- **Rhode Island** has entered into negotiations with Meta to narrow its claims assuming the parties can reach a mutually agreeable stipulation regarding ongoing discovery obligations.
- The **Louisiana** Attorney General's Office will produce to Meta the responsive agency documents that it currently has in its possession, but each state agency may have additional documents responsive to the existing state agency document discovery agreements that have yet to be provided to the Attorney General's Office. Yesterday, the Attorney General's Office asked Meta to contact those state agencies directly about the status of their remaining document productions. Meta has reached out to those agencies to schedule a call about the status of their document productions, and is waiting to hear back.
- The **Delaware** Attorney General's Office has shared the District Court's order with the Delaware state agencies covered by this Court's September 6, 2024 agency discovery order (ECF 1117), advised Meta that two agencies are in the process of retaining outside counsel, and told Meta to await such contact from such soon-to-be-retained outside counsel. The Delaware Governor's Office separately reached out to schedule a call with Meta, and that call is now scheduled for Monday.

II. Administrative Issues that Are Disputed or Require Court Action

The Parties do not have any disputed administrative issues that they would like to bring to the Court's attention.

III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently

A. Defendants v. PI Bellwethers

1. Plaintiff Jessica Smith’s clawback of communications based upon the assertion of patient/therapist privilege and Defendants’ request for certain medical records from Plaintiff Jessica Smith (Supplemental Joint Letter Brief filed under seal on March 13, 2025) (ECF 1761)

B. Meta v. All Plaintiffs

1. Plaintiffs’ Request for Clarification re the Requirements Under the Protective Order for Showing Highly Confidential “Meta Platforms” Custodian Documents to Former Meta Employees in Deposition (Joint Letter Brief To Be Filed March 18, 2025)
2. Plaintiffs’ Notices of Intent to Take Depositions of Three Former Meta Employee Witnesses¹

C. Meta v. State AGs

1. Meta’s Amended 30(b)(6) Notice to Certain States Only Asserting COPPA Claims (or Transitioning to Such Status) (Joint Letter Brief To Be Filed March 17, 2025)
2. Meta’s Responses and Objections (“R&Os”) to State AGs’ RFP No. 102 (Joint Letter Brief To Be Filed March 18, 2025)

D. YouTube v. PI/SD Plaintiffs

1. Plaintiffs’ 30(b)(6) Notices (Joint Letter Brief To Be Filed March 18, 2025)

E. Meta v. Third Parties

1. Meta’s Subpoenas for Documents from Former Employees Bejar and Jayakumar (Joint Letter Briefs Filed March 14, 2025) (ECF 1764, 1765)

¹ The Parties had an initial conferral on this issue on Friday, March 14, and have not yet had an H.2 conference. This issue may or may not be ripe in advance of the DMC.

IV. Unripe Disputes

A. Defendants v. PI Bellwethers

1. Craig and McNeal – number and timing of depositions of third-party witnesses
2. Craig – court order related to prohibition on internet access
3. Mullen – deposition of witness located in Switzerland
4. S.K. – Plaintiff's production of documents from non-Defendant social media accounts
5. Defendants' production of bellwether-specific data
6. RFPs held in abeyance
7. Number and timing of depositions of third-party witnesses

B. Defendants v. SD Bellwethers

1. Bellwether School District RFP Set A
2. 30(b)(6) Notice [Chathams]
3. Disputes re Privilege Logs
4. Interrogatory No. 4 Deficiencies
5. Interrogatory No. 5 Deficiencies
6. Non-Custodial Sources
7. Non-Bellwether PFS Deficiencies
8. SD Plaintiffs' 30(b)(6) Deposition Notices to Defendants

C. Meta v. All Plaintiffs

1. Interrogatories relating to Plaintiff-specific affirmative defenses
2. Meta's R&Os to Plaintiffs' Second and Third Sets of ROGs
3. Meta's written interrogatory responses from Meta Related Actions
4. Meta v. PI/SD Plaintiffs
5. School District RFP No. 3 from Set A
6. Privilege disputes

D. Meta v. State AGs

1. Meta's Document Requests to the California Governor's Office of Business and Economic Development
2. State AGs' R&Os to Meta's Third Set of RFPs
3. State AGs' R&Os to Meta's First and Second Set of ROGs
4. State AGs' 30(b)(6) Deposition Notice to Meta
5. Meta's Amended 30(b)(6) Notice to States Asserting Both Consumer Protection and COPPA Claims²
6. Meta's R&Os to the State AGs' RFPs and ROGs related to financial data and information

E. Snap v. PI/SD Plaintiffs

1. Production schedule for Snap's substantial completion of custodial Snapchat communications
2. Scope of Plaintiffs' Rule 30(b)(6) notice regarding school district-related topics

F. TikTok v. PI/SD Plaintiffs

1. School District RFP No. 5
2. Plaintiffs' challenges to the TikTok Defendants' privilege claims
3. Interrogatories Sets 4 & 5
4. Apex depositions
5. Plaintiffs' request for work-related text messages stored on a company employee's personal cell phone
6. Counsel's questioning in and objections at company witness depositions
7. Plaintiffs' request for additional Zoom and other meeting recordings
8. Interrogatories Set 7

G. YouTube v. PI/SD Plaintiffs

1. RFP Nos. 16 and 18

² The State AGs contend this issue is ripe.

2. RFP Nos. 37 and 50
3. RFP 62, 69, 71-72, 76, and 79
4. Interrogatories Set 2 (No. 2)
5. RFP Sets 11 and 12
6. RFP Nos. 107-109
7. RFP Nos. 86-87
8. Non-Custodial Sources³
9. YouTube Amended Disclosures⁴

³ Plaintiffs contend this issue is ripe.

⁴ Plaintiffs contend this issue is ripe.

Respectfully submitted,

DATED: March 14, 2025

By: /s/ Lexi J. Hazam

LEXI J. HAZAM

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

275 BATTERY STREET, 29TH FLOOR
SAN FRANCISCO, CA 94111-3339

Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN

MOTLEY RICE LLC

401 9th Street NW Suite 630

Washington DC 20004

Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER

SEEGER WEISS, LLP

55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660

Telephone: 973-639-9100
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement Counsel

JENNIE LEE ANDERSON

ANDRUS ANDERSON, LLP

155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104

Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel and Ombudsperson

MATTHEW BERGMAN

SOCIAL MEDIA VICTIMS LAW CENTER

821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104

Telephone: 206-741-4862
matt@socialmediavictims.org

JAMES J. BILSBORROW

WEITZ & LUXENBERG, PC

700 BROADWAY

1 NEW YORK, NY 10003
2 Telephone: 212-558-5500
3 jbilborrow@weitzlux.com

4 ELLYN HURD
5 **SIMMONS HANLY CONROY, LLC**
6 112 MADISON AVE, 7TH FLOOR
7 NEW YORK, NY 10016
8 Telephone: 212-257-8482
9 ehurd@simmonsfirm.com

10 ANDRE MURA
11 **GIBBS LAW GROUP, LLP**
12 1111 BROADWAY, SUITE 2100
13 OAKLAND, CA 94607
14 Telephone: 510-350-9717
15 amm@classlawgroup.com

16 MICHAEL M. WEINKOWITZ
17 **LEVIN SEDRAN & BERMAN, LLP**
18 510 WALNUT STREET
19 SUITE 500
20 PHILADELPHIA, PA 19106
21 Telephone: 215-592-1500
22 mweinkowitz@lfsbalw.com

23 MELISSA YEATES
24 **KESSLER TOPAZ MELTZER & CHECK LLP**
25 280 KING OF PRUSSIA ROAD
26 RADNOR, PA 19087
27 Telephone: 610-667-7706
28 myeates@ktmc.com

Plaintiffs' Steering Committee Leadership

21 RON AUSTIN
22 **RON AUSTIN LAW**
23 400 MANHATTAN BLVD.
24 HARVEY, LA 70058
25 Telephone: 504-227-8100
26 raustin@ronaustinlaw.com

27 AELISH M. BAIG
28 **ROBBINS GELLER RUDMAN & DOWD LLP**
1 MONTGOMERY STREET, #1800
SAN FRANCISCO, CA 94104
Telephone: 415-288-4545
AelishB@rgrd.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PAIGE BOLDT
ANAPOL WEISS
130 N. 18TH STREET, #1600
PHILADELPHIA, PA 19103
Telephone: 215-929-8822
pboldt@anapolweiss.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

FELICIA CRAICK
KELLER ROHRBACK LLP
1201 THIRD AVENUE, SUITE 3400
SEATTLE< WA 98101
Telephone: 206-623-1900
fcraick@kellerrohrback.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

KIRK GOZA
GOZA HONNOLD
9500 NALL AVE. #400
OVERLAND PARK, KS 66207
Telephone: 913-412-2964
Kgoza @gohonlaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

MATTHEW P. LEGG
BROCKSTEDT MANDALAS FEDERICO, LLC
2850 QUARRY LAKE DRIVE, SUITE 220
BALTIMORE, MD 21209
Telephone: 410-421-7777

1 mlegg@lawbmf.com

2 SIN-TING MARY LIU
3 **AYLSTOCK WITKIN KREIS &**
4 **OVERHOLTZ, PLLC**
5 17 EAST MAIN STREET, SUITE 200
6 PENSACOLA, FL 32502
7 Telephone: 510-698-9566
8 mliu@awkolaw.com

9 JAMES MARSH
10 **MARSH LAW FIRM PLLC**
11 31 HUDSON YARDS, 11TH FLOOR
12 NEW YORK, NY 10001-2170
13 Telephone: 212-372-3030
14 jamesmarsh@marshlaw.com

15 JOSEPH H. MELTER
16 **KESSLER TOPAZ MELTZER & CHECK LLP**
17 280 KING OF PRUSSIA ROAD
18 RADNOR, PA 19087
19 Telephone: 610-667-7706
20 jmeltzer@ktmc.com

21 HILLARY NAPPI
22 **HACH & ROSE LLP**
23 112 Madison Avenue, 10th Floor
24 New York, New York 10016
25 Telephone: 212-213-8311
26 hnappi@hrsclaw.com

27 EMMIE PAULOS
28 **LEVIN PAPANTONIO RAFFERTY**
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.

1 15910 Ventura Boulevard, Suite 1600
2 Encino, CA 91436
3 Telephone: 818-839-2333
4 rtellis@baronbudd.com
5 dfernandes@baronbudd.com

6 DIANDRA "FU" DEBROSSE ZIMMERMANN
7 **DICELLO LEVITT**
8 505 20th St North
9 Suite 1500
10 Birmingham, Alabama 35203
11 Telephone: 205-855-5700
12 fu@dicellolevitt.com

13 Plaintiffs' Steering Committee Membership

14 JOSEPH VANZANDT
15 **BEASLEY ALLEN**
16 234 COMMERCE STREET
17 MONTGOMERY, LA 36103
18 Telephone: 334-269-2343
19 joseph.vanzandt@beasleyallen.com

20 Federal/State Liaison

21 *Attorneys for Individual Plaintiffs*
22
23
24
25
26
27
28

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066,
pro hac vice
Deputy Solicitor General
Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*
Solicitor General
Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
krista.batchelder@coag.gov
Shannon.stevenson@coag.gov
Elizabeth.orem@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA

Attorney General
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480

Megan.Oneill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN

Attorney General
Commonwealth of Kentucky

/s/ Philip Heleringer

J. Christian Lewis (KY Bar No. 87109),
Pro hac vice

Philip Heleringer (KY Bar No. 96748),
Pro hac vice

Zachary Richards (KY Bar No. 99209),
Pro hac vice

Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice

Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/ Thomas Huynh

Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice

Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice

Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice

Mandy K. Wang (NJ Bar No. 373452021),

Pro hac vice

Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Attorney General
and the New Jersey Division of Consumer Affairs
Matthew J. Platkin, Attorney General for the State of
New Jersey, and Cari Fais, Acting Director of the New
Jersey Division of Consumer Affairs*

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

KING & SPALDING LLP

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake, *pro hac vice*
TaCara D. Harris, *pro hac vice*
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100
Email: gdrake@kslaw.com
tharris@kslaw.com

Kristen R. Fournier, *pro hac vice*
KING & SPALDING LLP
1185 Avenue of the Americas, 34th Floor
New York, NY 10036-2601
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Email: kfournier@kslaw.com
David P. Mattern, *pro hac vice*

1 KING & SPALDING LLP
2 1700 Pennsylvania Avenue, NW, Suite 900
3 Washington, DC 20006-4707
4 Telephone: (202) 737-0500
5 Facsimile: (202) 626-3737
6 Email: dmattern@kslaw.com

7 Bailey J. Langner (SBN 307753)
8 KING & SPALDING LLP
9 50 California Street, Suite 3300
10 San Francisco, CA 94111
11 Telephone: (415) 318-1200
12 Facsimile: (415) 318-1300
13 Email: blangner@kslaw.com

14 Andrea Roberts Pierson, *pro hac vice*
15 FAEGRE DRINKER LLP
16 300 N. Meridian Street, Suite 2500
17 Indianapolis, IN 46204
18 Telephone: + 1 (317) 237-0300
19 Facsimile: + 1 (317) 237-1000
20 Email: andrea.pierson@faegredrinker.com

21 Amy R. Fiterman, *pro hac vice*
22 FAEGRE DRINKER LLP
23 2200 Wells Fargo Center
24 90 South Seventh Street
25 Minneapolis, MN 55402
26 Telephone: +1 (612) 766-7768
27 Facsimile: +1 (612) 766-1600
28 Email: amy.fiterman@faegredrinker.com

*Attorneys for Defendants TikTok Inc., ByteDance Inc.,
TikTok Ltd., ByteDance Ltd., and TikTok LLC*

22 MUNGER, TOLLES & OLSON LLP
23 By: /s/ Jonathan H. Blavin
24 Jonathan H. Blavin, SBN 230269
25 MUNGER, TOLLES & OLSON LLP
26 560 Mission Street, 27th Floor
27 San Francisco, CA 94105-3089
28 Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)

1 Laura M. Lopez, (SBN 313450)
2 Ariel T. Teshuva (SBN 324238)
3 MUNGER, TOLLES & OLSON LLP
4 350 South Grand Avenue, 50th Floor
5 Los Angeles, CA 90071-3426
6 Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702
8 Email: rose.ehler@mto.com
9 Email: victoria.degyareva@mto.com
10 Email: Ariel.Teshuva@mto.com

11 Lauren A. Bell (*pro hac vice forthcoming*)
12 MUNGER, TOLLES & OLSON LLP
13 601 Massachusetts Ave., NW St.,
14 Suite 500 E
15 Washington, D.C. 20001-5369
16 Telephone: (202) 220-1100
17 Facsimile: (202) 220-2300
18 Email: lauren.bell@mto.com

19 *Attorneys for Defendant Snap Inc.*

20 WILSON SONSINI GOODRICH & ROSATI
21 Professional Corporation
22 By: /s/ Brian M. Willen
23 Brian M. Willen (*pro hac vice*)
24 WILSON SONSINI GOODRICH & ROSATI
25 1301 Avenue of the Americas, 40th Floor
26 New York, New York 10019
27 Telephone: (212) 999-5800
28 Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Lauren Gallo White (SBN 309075)
Samantha A. Machock (SBN 298852)
WILSON SONSINI GOODRICH & ROSATI
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

Christopher Chiou (SBN 233587)
Matthew K. Donohue (SBN 302144)
WILSON SONSINI GOODRICH & ROSATI
953 East Third Street, Suite 100
Los Angeles, CA 90013

Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
Email: mdonohue@wsgr.com

Attorneys for Defendants YouTube, LLC and Google LLC

WILLIAMS & CONNOLLY LLP
By: /s/ Joseph G. Petrosinelli
Joseph G. Petrosinelli (*pro hac vice*)
jpetrosinelli@wc.com
Ashley W. Hardin (*pro hac vice*)
ahardin@wc.com
680 Maine Avenue, SW
Washington, DC 20024
Telephone.: 202-434-5000
Fax: 202-434-5029

Attorneys for Defendants YouTube, LLC and Google LLC

MORGAN, LEWIS & BOCKIUS LLP
By: /s/ Yardena R. Zwang-Weissman
Yardena R. Zwang-Weissman (SBN 247111)
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238
Email: yardena.zwang-weissman@morganlewis.com

Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416
Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
NW Washington, DC 20004-2541
Tel.: 202.373.6595
Email: stephanie.schuster@morganlewis.com

Attorneys for Defendants YouTube, LLC and Google LLC

ATTESTATION

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 14, 2025

By: /s/ Lexi J. Hazam
Lexi J. Hazam